

FILED 20 FEB '14 14:27 USDC-ORP

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF OREGON PORTLAND DIVISION

<p>MILAUDI KARBOAU Plaintiff,</p> <p>vs.</p> <p>CITY OF PORTLAND; PORTLAND POLICE BUREAU (PPB); JIM LAWRENCE; DAVID ANDERSON; VIRGINIA ANNE ANDERSON; CARL ANN WILLIAMS, TOM BADRICK, KGW NEWS CHANNEL 8 TV; RICK JACOBS; THE MID-COUNTY MEMO NEWS PAPER AND PUBLISHING, INC; SEAN P. NELSON; DARLENE VINSON Defendants.</p>	<p>3:14-CV-297 HU, District Court Case</p> <p>COMPLAINT</p> <p>JURY TRIAL DEMANDED</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------

UNLAWFUL SLANDERING AND DEFAMATION

Plaintiff	MILAUDI KARBOAU, 7585 SW Hunzker. Street Apt 50 Tigard, Oregon 97223. (503) 421 0740. Email: milaudikarboau@yahoo.com
Defendant No. 1	CITY OF PORTLAND 1221 SW 4th Avenue, Room 340, Portland, OR 97204.
Defendant No. 2	PORTLAND POLICE BUREAU (PPB) 1111 SW 2nd Ave, Portland OR 97204.
Defendant No. 3	DETECTIVE JIM LAWRENCE, PORTLAND POLICE BUREAU (PPB) 1111 SW 2nd Ave, Portland OR 97204.
Defendant No. 4	DAVID ANDERSON, PORTLAND POLICE BUREAU (PPB) 1111 SW 2nd Ave, Portland OR 97204.
Defendant No. 5	VIRGINIA ANNE ANDERSON, Plaintiff's ex neighbor. 10615 NE Eugene Street, Portland, Oregon 97220.
Defendant No. 6	CARL ANN WILLIAMS, The Parkrose Heights Association of Neighbors (PHAN) Board previous CHAIR and Acting SECRETARY. 1017 NE 117th Ave, Portland, OR 97220.

- Defendant No. 7 TOM BADRICK the current The Parkrose Heights Association of Neighbors (PHAN) Board CHAIR and Acting SECRETARY. 1017 NE 117th Ave, Portland, OR 97220.
- Defendant No. 8 KGW NEWS CHANNELS 8 TV. 1501 SW Jefferson St, Portland, OR 97201.
- Defendant No. 9 RICK JACOBS-KGW TV Executive News Director 1501 SW Jefferson St, Portland, OR 97201.
- Defendant No. 10 THE MID-COUNTY MEMO NEWS PAPER AND PUBLISHING, INC. 3510 N.E. 134th Ave., Portland, OR 97230.
- Defendant No.11 DARLENE VINSON-THE MID-COUNTY MEMO NEWS PAPER AND PUBLISHING, INC editor. 3510 N.E. 134th Ave., Portland, OR 97230.
- Defendant No. 12 SEAN P. NELSON-THE MID-COUNTY MEMO NEWS PAPER AND PUBLISHING, INC. Reporter. 3510 N.E. 134th Ave., Portland, OR 97230.
- Defendant No. 13 TIM CURRAN-THE MID-COUNTY MEMO NEWS PAPER AND PUBLISHING, INC. Publisher. 3510 N.E. 134th Ave., Portland, OR 97230.

☒ Federal Question

Preliminary Statement

This civil action by the Plaintiff *Milaudi Karboau* “prose” against the City of Portland, Portland Police Bureau (PPB), and its employees defendant detective Jim Lawrence and five John Doe officers pursuant to 28 U.S.C § 1983 Plaintiff allege violation of his constitutional rights alleging the defendants failed to return the seized property after it was no longer needed as evidence.

I. JURISDICTION & VENUE

1. This Court have jurisdiction over the Plaintiff’s claims of violation of federal constitutional rights pursuant to 42 U.S.C. §§1331(a) and 1343 (3)

2. The Court also has supplemental jurisdiction over the Plaintiff's states law tort claims under 28 U.S.C. § 1367. Plaintiff seeks money damage and declaratory relief pursuant to 28 U.S.C. § 2201 and 2202. 28 U.S.C. § 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure authorize plaintiff's claims for injunction relief.

3. This United States District Court of District of Oregon is an appropriate venue under 28 U.S.C. § 1391 (b)(2) because it is where the events giving rise to this claim occurred.

II. PLAINTIFF'S STATEMENT OF CLAIM

3. Plaintiff claims that the above defendants violated his right by wrongfully slandering him broadcasting him in the local newspaper and TV news channel. Defendants involved in the slandering and defamation are as named above.

4. The slandering and defamation was first initiated, planned and orchestrated by the Plaintiff's neighbors, Defendant Virginia Anderson who is now deceased March 11, 2013, and her son Defendant David Anderson who was then and now a Portland Police Bureau PPB Sergeant. Prior to the plaintiff's arrest on February 4th, by the PPB officer Defendant Jim Lawrence for attempting to receive stolen property Plaintiff and his neighbors (Virginia and her son David Anderson) had a serious feud that led the Plaintiff to file multiple complaints with the Portland Police Internal Affairs Review PIR and the Portland mayor's office against Defendant Anderson and his now deceased mother Defendant Virginian. Defendant Anderson was ordered by his superior lieutenant Mayciog, to stop his harassing Plaintiff. But the Defendant Anderson and his mama did not stop there; they continue their harassment against the Plaintiff. The Defendant Anderson and his mother Defendant Virginia harassment began when Plaintiff purchased his house next to their house. The Defendants (Andersons) opposed the Plaintiff living next to them

within the first week of the Plaintiff's moving in and blatantly told the Plaintiff that to move out of (their neighborhood).

5. After the Plaintiff's February 4th, 2002, arrest by Defendant Jim Lawrence he was released on February 7th, on his own recognizes with Court date appearance of April 9, 2002. Upon his release Plaintiff's neighbor Defendant David Anderson was waiting for him. Defendant Anderson told the Plaintiff I learned about your arrest for receiving stolen property, and told the Plaintiff that: *I will use my higher authority not some city clerk and the local channel 8 T.V news to have you re-arrested.* While on his own recognizance Defendant PPB Sergeant David Anderson threat was fulfilled, on April 2nd, 2002, and before the Plaintiff's scheduled April 9th, Court appearance, Defendant officer Jim Lawrence come to re-arrest the plaintiff for the same charges he was arrest for on February charges, (double jeopardy) Plaintiff was put in the police car and taken to jail, and Defendant Sergeant Anderson's higher authority began to work, since then everything went wrong in the Plaintiff's trial and Plaintiff was maliciously convicted and on December 19, 2002, Plaintiff was sentenced to 104 purportedly for receiving stolen, case No. 02-0230995. State of Oregon vs. Karboau. In this case Plaintiff is not arguing his conviction or sentencing. But he sure litigating the wrongful defamation and slandering that implemented by the above named defendants. This lawsuit is timely file because Plaintiff did not discover or had any knowledge nor has he been aware of the slandering and the defamation against him until he got out from the prison and early February 2013 when he goggled his name and there comes his story being slandered by the defendants the above named. It appears that in retaliation against the Plaintiff by his neighbors the March 11, 2013 diseased Defendant Virginia; her son Defendant David Anderson the PPB Sergeant and Defendant Jim Lawrence the PPB officer and involving Defendant Carol Williams, Chair, of Parkrose Heights Association of Neighbors.

(PHAN) of Northeast Portland, Oregon made up a story and contacted the local news channel 8 TV and the Mid County Memo newspaper, The articles read: **POLICE DETERMINED KARBOAU WAS USING IDENTITY THEFT TECHNIQUES TO PURCHASE THE CARS AND OTHER PROPERTY FRAUDULENTLY, ACTIONS REPORTED BY THE MID-COUNTY MEMO AND BROADCAST BY NEWSCHANNEL 8.**

6. The untruthful news reported by the Newschannel 8 and the Mid County Memo was taken directly from the mouth of the Portland Police Bureau PPB detective Jim Lawrence whom he and other PPB officers were instigated by Defendant Sergeant David Anderson and his mother Virginia Anderson to fulfill Sergeant David Anderson's February 7th, threat: *I will use my higher authority not some city clerk and the local channel 8 T.V news to have you re-arrested.* The false publicity of TV broadcasting and newspaper articles during the Plaintiff's incarceration in the county jail influenced the trial Court to enhance and give the Plaintiff a harsh sentencing. The Defendants again re-run the TV broadcasting and the newspaper articles shortly after the Plaintiff was maliciously convicted and sentenced to 104 months for receiving stolen. The Plaintiff's criminal record shows that he never been arrested, charged or convicted of purchasing cars with stolen credits card. The evidence will be available during the discovery.

7. The Mid County Memo newspaper and the channel 8 TV news Defendants are as well responsible for slandering and defamation damage for accepting to write and publicize the false articles in newspaper and broadcasting it without the truth verification or contacting the Plaintiff.

8. The Parkrose Heights Association of Neighbors (PHAN) and The current Board Members Tom Badrick CHAIR and Acting SECRETARY, and predecessor of the deceased and previous Carl Ann Williams CHAIR and Acting SECRETARY are responsible for joining the

PPB officers, and the Plaintiff's neighbor Virginia Anderson to influence the newspaper and TV media to slander the plaintiff.

Respectfully submitted

Dated this 20th day of February 2014

A handwritten signature in black ink, appearing to read 'Milaudi Karboau', with a large, sweeping flourish extending upwards and to the right.

Milaudi Karboau
7582 SW Hunziker Street, Apt 50
Tigard, Oregon 97223
E mail: milaudikarboau@yahoo.com
Home (503) 443-6420